

1 ROBERT W. COTTLE, ESQ.
Nevada Bar No. 4576
2 MATTHEW D. MINUCCI, ESQ.
Nevada Bar No. 12449
3 **THE COTTLE FIRM**
8635 S. Eastern Avenue
4 Las Vegas, Nevada 89123
5 Email: mminucci@cottlefirm.com
6 Phone: (702) 722-6111
Facsimile: (702) 834-8555

7 And

8 ROBERT B. SIDELL, ESQ.
Nevada Bar No. 1196
9 R. HUNTER SIDELL, ESQ.
Nevada Bar No. 14620
10 **SIDELL INJURY LAW**
3424 West Charleston Boulevard
11 Las Vegas, NV 89102
Attorneys for Plaintiffs

12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 THE ESTATE OF DECEDENT WITTNEY
16 PAIGE BECKSTEAD; KARIN HEITZ, an
individual/heir,

17 Plaintiff,

18 vs.

19 FCA US LLC, a Foreign Limited-Liability
20 Company, d/b/a JEEP; LAS VEGAS-J, LLC., a
Domestic Limited-Liability Company d/b/a JEEP
21 ONLY; DOES 1 through 20, inclusive; and ROE
22 ENTITIES 1 through 20, inclusive,

23 Defendants.

CASE NO.: 2:23-cv-01755

24 **STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES**

25 ***(First Request)***

26 Plaintiffs THE ESTATE OF DECEDENT WITTNEY PAIGE BECKSTEAD and KARIN
27 HEITZ, through their counsel The Cottle Firm, Defendant FCA US LLC., d/b/a JEEP (hereinafter
28 “FCA US”), through their counsel Melissa P. Wilner, Esq., of Klein Thomas Lee & Fresard, and

1 Defendant LAS VEGAS-J, LLC d/b/a JEEP ONLY, through their counsel Griffith H. Hayes, Esq., of
2 Tyson & Mendes, LLP., hereby stipulate and agree, pursuant to LR 26-3, to vacate and extend the
3 current discovery deadlines set forth in the Discovery Plan and Scheduling Order filed on December
4 12, 2023 (Document #14).

6 **A. DISCOVERY COMPLETED TO DATE:**

- 7 1. Plaintiffs served their Initial List of Witnesses and Documents Pursuant to FRCP 26(a)(1) on
8 December 6, 2023.
- 9 2. Defendant FCA US LLC served its Initial Disclosures Pursuant to Rule 26(a)(1) on December
10 19, 2023.
- 11 3. Defendant Las Vegas-J, LLC d/b/a Jeep Only served their Initial List of Witnesses and
12 Documents Pursuant to FRC 26(a)(1) on December 20, 2023.
- 13 4. Plaintiffs served their First Set of Requests for Admissions to Defendant FCA US LLC d/b/a
14 Jeep on February 9, 2024.
- 15 5. Plaintiffs served their First Set of Requests for Production of Documents to Defendant FCA
16 US LLC d/b/a Jeep on February 9, 2024.
- 17 6. Plaintiffs served their First Set of Interrogatories to Defendant FCA US LLC d/b/a Jeep on
18 February 9, 2024.
- 19 7. Plaintiffs served their First Set of Requests for Admissions to Defendant Las Vegas-J, LLC
20 d/b/a Jeep Only on February 9, 2024.
- 21 8. Plaintiffs served their First Set of Requests for Production of Documents to Defendant Las
22 Vegas-J, LLC d/b/a Jeep Only on February 9, 2024.
- 23 9. Plaintiffs served their First Set of Interrogatories to Defendant Las Vegas-J, LLC d/b/a Jeep
24 Only on February 9, 2024.

10. Defendant FCA US LLC served its First Supplemental Disclosure Pursuant to Rule 26(a)(1) on February 28, 2024.
11. Defendant FCA US LLC served its Responses to Plaintiff's First Set of Requests for Admissions on March 11, 2024.
12. Defendant FCA US LLC served its Responses to Plaintiff's First Set of Requests for Production on March 11, 2024.
13. Defendant FCA US LLC served its Responses to Plaintiff's First Set of Interrogatories on March 11, 2024.
14. Defendant Las Vegas-J, LLC d/b/a Jeep Only served their First Supplement to Initial Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1) on April 5, 2024.
15. Defendant Las Vegas-J LLC served their Responses to Plaintiff's First Set of Interrogatories on April 5, 2024.
16. Defendant Las Vegas-J LLC served their Responses to Plaintiff's First Set of Requests for Admissions on April 5, 2024.
17. Defendant Las Vegas-J LLC served their Responses to Plaintiff's First Set of Requests for Production of Documents on April 5, 2024.
18. Defendant FCA US LLC served its First Set of Requests for Production of Documents to Plaintiffs on April 24, 2024.
19. Defendant FCA US LLC served its First Set of Interrogatories to Plaintiffs on April 24, 2024.
20. Defendant FCA US LLC served its First Set of Requests for Admissions on April 24, 2024.
21. Defendant FCA US LLC served its Second Supplemental Disclosure Pursuant to Rule 26(a)(1) on May 7, 2024.

22. Plaintiffs served their Responses to Defendant FCA US LLC's First Set of Requests for Admission on May 22, 2024.

23. Plaintiffs served their Responses to Defendant FCA US LLC's First Set of Interrogatories on June 7, 2024.

24. Plaintiffs served their Responses to Defendant FCA US LLC's First Set of Requests for Production of Documents on June 7, 2024.

B. DESCRIPTION OF DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Plaintiff intends to take the deposition of Defendants FRCP 30(b)(6).
2. Defendants intend to take the deposition of Plaintiff.
3. The parties intend to take the deposition of multiple California Highway Patrol Officers
4. The parties intend to take the deposition of multiple witnesses to the subject accident.
5. The parties intend to take the deposition of the San Bernardino Coroner who performed the autopsy.
6. The parties intend to inspect the subject vehicle.
7. The parties may take expert depositions.

C. REASON WHY DISCOVERY WAS NOT COMPLETED:

The parties are extending discovery based on a delay in purchasing the subject vehicle. The parties are seeking to purchase the subject vehicle in order to perform extensive and, possibly, destructive testing, which the parties are unable to conduct at the current location and without ownership. The parties are working with the GAP insurer to issue payment to the lien holder so that the parties can move the vehicle into a secure location for expert testing. All required documents have been submitted to the GAP insurer and the parties anticipate being in possession the subject vehicle

1 in the next 45 days. The parties submit these reasons constitute good cause under LR 26-3 for the
2 extension.

3 The parties do not bring this motion for purpose of delay.

4 **D. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY:**

- 5 1. Discovery Cut-Off Date: **Tuesday, April 1, 2025.**
- 6 2. Amending the Pleadings and Adding parties: **Friday, November 1, 2024.**
- 7 3. FRCP 26(a)(2) Disclosure of Initial Experts: **Friday, January 17, 2025.**
- 8 4. FRCP 26(a)(2) Disclosures of Rebuttal Experts: **Friday, March 14, 2025.**
- 9 4. Dispositive Motions: **Friday, May 2, 2025.**
- 10 5. Pre-Trial Order: **Tuesday, June 3, 2025.**

11 This Stipulation is made in good faith and not for the purpose of delay.

12 DATED this 13th day of June, 2024.

13 **THE COTTLE FIRM**

14 By: /s/ Matthew D. Minucci
15 ROBERT W. COTTLE, ESQ.
16 Nevada Bar No. 4576
17 MATTHEW D. MINUCCI, ESQ.
18 Nevada Bar No. 12449
19 8635 South Eastern Avenue
20 Las Vegas, Nevada 89123
21 Phone: (702) 722-6111
22 Facsimile: (702) 834-8555
23 *Attorneys for Plaintiffs*

24 **TYSON & MENDES LLP**

25 By: /s/ Griffith H. Hayes
26 GRIFFITH H. HAYES, ESQ.
27 Nevada Bar No. 7374
28 CHRISTOPHER A. LUND, ESQ.
Nevada Bar No. 12435
2835 St. Rose Parkway, Suite 140
Henderson, NV 89052
Attorneys for Defendant Las Vegas-J, LLC

The Estate of Wittney Beckstead v. FCA US, LLC, et al.
Case No.: 2:23-cv-01755
Stipulation and Order to Continue Discovery (1st Request)

KLIEN THOMAS LEE & FRESARD

By: /s/ Melissa P. Wilner

MELISSA P. WILNER, ESQ.
Nevada Bar No. 16471
1920 Main Street, Suite 230
Irvine, CA 92614

MARIO D. VALENCIA, ESQ.
Nevada Bar No. 6154

ATTORNEY AT LAW, LLC

40 South Stephanie Street, Suite 201
Henderson, NV 89102

Attorneys for Defendant FCA US LLC

IT IS SO ORDERED. Any future stipulations must include then existing deadlines and make showing of good cause that considerable discovery, including depositions, has been completed.



UNITED STATES MAGISTRATE JUDGE

DATED: 6-20-24